

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

KH-REIT II FUNDING XXII, LLC,

Plaintiff,

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v.

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GRANT MEADOWS, LLC,

Defendant.

Case No. 4:22-CV-3730

AGREED MOTION TO AMEND SCHEDULING ORDER

Plaintiff KH-Reit II Funding XXII, LLC (“Knighthead”) and Defendant Grant Meadows, LLC jointly file this Agreed Motion to Amend Scheduling Order and respectfully request that the Court sign and enter as the controlling order in this case the attached First Amended Scheduling/Docket Control Order.

Grant Meadows has indicated that it needs until May 15, 2023 to complete its production of documents for its Rule 26 Initial Disclosures and in response to Knighthead’s Requests for Disclosure (served on February 16, 2023). To provide Grant Meadows the time to complete its document production, the parties have agreed to a mutual document exchange date of May 17, 2023, at which time the parties will produce documents responsive to any currently pending document requests and as required by Rule 26(a)(1)(A)(ii)-(iii).

This agreed document exchange date necessitates changes in other scheduling order deadlines, which are reflected in the attached First Amended Agreed Scheduling Order. The parties do *not* seek to move the Dispositive Motions deadline of December 8, 2023, the Joint Pre-Trial and Motions *in Limine* deadline of March 4, 2024, or the Trial date of March 11, 2024.

For these reasons, the parties jointly request that the Court sign and enter as the controlling scheduling order in this case the attached First Amended Scheduling/Docket Control Order.

Respectfully submitted,

/s/ Matthew Baumgartner _____

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Agreed:

/s/ J. Robert MacNaughton _____

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ATTORNEY FOR DEFENDANT
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CERTIFICATE OF CONFERENCE

I hereby certify that on April 20, 2023, I conferred with Mr. Robert McNaughton, counsel for Defendant, and he informed me that Defendant does not oppose this motion.

/s/ Guillermo A. Alarcon _____

Guillermo A. Alarcon

CERTIFICATE OF SERVICE

I hereby certify that the foregoing pleading was served on all counsel of record on April 20, 2023.

/s/ Guillermo A. Alarcon

Guillermo A. Alarcon